To: Alkon, Margaret[Alkon.Margaret@epa.gov]; Watanabe, Allison[Watanabe.Allison@epa.gov]

**Cc:** Kirk Shermer[Kirk@snowdenenterprises.com]

From: Janelle Kay

Sent: Thur 4/14/2016 5:52:04 PM Subject: Snowden Label Layout

111521 The Fruit Doctor CA-1 MK approved 20160408.pdf 114617 The Fruit Doctor Prime MK approved 20160407.pdf

Dear Margaret and Allison,

In follow-up to our phone conversation earlier this week, below (and attached) is a summary of the proposed label layout/design based on the most recent approved EPA labeling.

Snowden packages and distributes sulfur dioxide under the brand name "The Fruit Doctor." While The Fruit Doctor is sold in a multitude of cylinder sizes ranging from 0.5 pounds to 150 pounds, the packaging is separated into two distinct cylinder sizing:

- Cylinders 9 pounds and under (referred to as "small cylinders")
- • Cylinders over 9 pounds (referred to as "large cylinders")

For cylinders over 9 pounds, Snowden sells the cylinders individually. Based on the new EPA approved labeling, Snowden will attach a booklet (see attached file: 111521 The Fruit Doctor CA-1\_MK approved 20160408.pdf). This booklet contains the entire labeling approved in the most recent EPA approved label dated April 1, 2016. The first page of this document corresponds to the "base label" which is securely affixed to the cylinder. In the event the booklet is somehow ripped off the cylinder, the base label remains affixed. The second page of this document corresponds to the front panel of the booklet which is readily readable to the user/purchaser of the product. The remaining pages correspond to the text inside the label booklet.

Cylinders 9 pounds and under are always sold in a case (or "unit packaging"); these small cylinders are *not* individually sold. The outside of the case contains a booklet (the same booklet used for larger cylinders which contain the entire labeling). A separate base label is securely affixed to each cylinder (see 114617 The Fruit Doctor Prime\_MK approved 20160407). Because of size limitations on the small cylinders, the small diameter of the cylinder making it

difficult to securely affix a thick booklet, and because the small cylinders are only sold in cases, a booklet label is *not* attached to each small cylinder, but one booklet is affixed to the outside of the case.

It is also important to note that the same sized cylinder may be used for differing weights/net contents. In other words, the same cylinder could contain 10 pounds, 12 pounds or 15 pounds of sulfur dioxide. Because of the large variety of weights sold and the ability to custom order/fill a particular weight, the net weight is included in a sticker at the neck of the cylinder. This is relevant to both small cylinders or large cylinders.

Hopefully that sufficiently describes the proposed labeling for Snowden's The Fruit Dcotor. However, please don't hesitate to contact me if you have any questions or need any additional information.

Regards,

Janelle

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